

Memorandum

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EXALDO TOPACIO, on behalf of himself and all
others similarly situated,

Plaintiff,

- vs -

VERIZON COMMUNICATIONS INC., a
corporation and VERIZON NETWORK
INTEGRATION CORP., a corporation

Defendants.

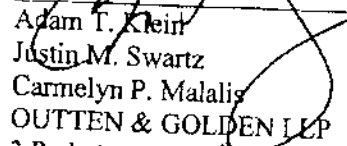
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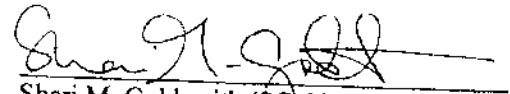
**STIPULATION AND ORDER
EXTENDING TIME TO ANSWER
OR MOVE**

IT IS HEREBY STIPULATED AND AGREED by and among the undersigned, the attorneys for Plaintiff Exaldo Topacio ("Plaintiff") and Defendants Verizon Communications Inc. and Verizon Network Integration Corp. (collectively, "Defendants") in the above-captioned action that: (1) Defendants filed a notice of removal of Plaintiff's state court action to this Court on September 25, 2007; (2) the parties previously agreed that with respect to the state court complaint – the operative pleading prior to Defendants' filings of their Notice of Removal to the United States District Court for the Southern District of New York – that Defendants' time to answer, move or otherwise respond to the Complaint in the above-captioned action was extended to October 26, 2007; and (3) that the parties' previously agreed upon extension of time for Defendants to answer, move or otherwise respond is extended to October 26, 2007, shall now apply to the Complaint in the above-captioned federal court action. This is the first request for an extension of this deadline.

Dated: New York, New York
September 26, 2007


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SO ORDERED:


Hon. Colleen McMahon, U.S.D.J.

NY1-4026841v1

9-28-07